

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

CHRISTOPHER L. TUCKER,

Plaintiff,

v.

CITY OF OKLAHOMA CITY, a

municipal corporation,

LANCE BEMO, an individual,

JURDEN BROWN, an individual,

MATHEW NELSON, an individual,

JEFF COOPER, an individual,

JOHN BLUMENTHAL, an individual,

Defendants.

Case No. CIV-11-922-D

**JOINT APPLICATION FOR PROTECTIVE ORDER**

COMES NOW the parties and make joint application to this Court for a Protective Order pursuant to Fed.R.Civ.P. 26(c). The City of Oklahoma City agrees to produce at a mutually agreeable date and time to the parties the following:

1. Unredacted Use of Force Report and Completed Screening Committee Forms regarding OCPD case #10-54666.
2. Any formal complaint and the investigation into same regarding Defendants Bemo, Brown, and Nelson.
3. All formal complaints filed with the OCPD alleging police brutality for three (3) years preceding the Plaintiff's arrest and the investigations into same.

4. Redacted copies of the personnel files of Defendants Bemo, Brown, and Nelson.
5. All Use of Force Investigations regarding Defendants Bemo, Brown, and Nelson.
6. All Use of Force Investigations conducted by the OCPD for the three (3) years preceding the Plaintiff's arrest.
7. The following emails and memorandums regarding Plaintiff's interaction with the OCPD: Memo to Major John Gonshor from Captain Bacy dated May 3, 2011 with attached CD; 3 emails printed by Captain Bacy dated January 10, 2011; 1 email printed by Captain Bacy dated January 28, 2011; 1 email printed by Captain Bacy dated January 25, 2011; Memo dated Monday, January 10, 2011 with words "Captain Bacy" hand written on it; 2 emails printed by Captain Bacy dated February 22, 2011 and July 8, 2010; 5 emails printed by Deputy Chief John Scully, two dated June 7, 2011 and 3 dated June 6, 2011; and 3 emails printed by Deputy Chief John Scully, one dated June 7, 2011 and 2 dated June 6, 2011.

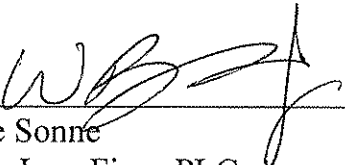
By producing the above documents the City of Oklahoma City does not waive any privilege concerning these documents, or any other documents that parties may attempt to discover. Further, the City does not agree that these documents or any of them are admissible.


The parties consent that an Order be entered pursuant to Fed.R.Civ.P 26(c) that provides that none of the above documents shall be disclosed to any person, organization

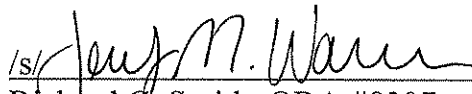
or entity except to the attorneys representing the parties, their staff, investigators and experts. Further, the attorneys of record for the parties shall be responsible to insure that this Protective Order is honored and enforced. If any of these documents are to be filed in this case, the document shall be filed in a sealed envelope to be opened as directed by the Court. Further, counsel for all parties shall immediately destroy all these documents and all copies thereof as soon as this case is finally concluded. Further, counsel shall provide all other parties written documentation of said destruction of documents.

WHEREFORE, premises considered, the parties pray a Protective Order be entered as requested herein.

**AGREED:**

  
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Blake Sonne  
Sonne Law Firm, PLC  
P.O. Box 667  
Norman, OK 73070  
Attorney for Plaintiff

  
\_\_\_\_\_  
Susan A. Knight, OBA #14594  
211 North Robinson, Suite 800 N  
Oklahoma City, OK 73102  
Attorney for Defendant Officers  
In their Individual Capacities

  
\_\_\_\_\_  
/s/ Richard C. Smith, OBA #8397  
Jennifer M. Warren, OBA #30284  
200 North Walker, Suite 400  
Oklahoma City, OK 73102  
Attorneys for Defendant City